

EXHIBIT B



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

MKM:TH/MKP
F. #2017R01840

*271 Cadman Plaza East
Brooklyn, New York 11201*

August 30, 2018

By Email

David Stern, Esq.
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100 Lafayette Street, Suite 501
New York, New York 10013

Re: United States v. Nancy Salzman, et al.
Criminal Docket No. 18-204 (S-1) (NGG)

Dear Counsel:

The government writes to request additional information regarding your objection to disclosure of discovery copies of certain materials to all defendants in the above-captioned case.

By letter dated August 3, 2018, the government notified you that it is in possession of certain electronic evidence, including, but not limited to: (1) electronic devices obtained through the execution of a search warrant at 3 Oregon Trail, Halfmoon, New York; and (2) electronic devices obtained through the execution of a search warrant at 8 Hale Drive, Halfmoon, New York. At the same time, the government disclosed the applications for both search warrants, as well as photographs of the execution of the search warrants, including photographs of the devices seized during the course of the search. The government requested that, to the extent your client objected to the disclosure of full discovery copies of such materials to all defendants, that you notify the government "as soon as possible and no later than August 8, 2018," noting that such objections may delay the production of discovery. Gov't Letter at 5 n.2. Having received no objection from you by that date, the government provided the materials to DupeCoop and informed you and other defendants, by letter, that they were available for production pursuant to the protective order entered by the Court.

On August 28, 2018, the government received an email from you stating that you objected to the "distribution of items seized from our client—or places attributable to her—to anyone but us, unless such items are within the scope of the warrant and are

established to not contain irrelevant, privileged, or otherwise confidential materials,” and noting that you intended to present the government with “more detail” regarding your objection. The government has informed DupeCoop that it should, until further notice, release the material at issue to you, but not to counsel for the other defendants.

Attached hereto are search warrant returns identifying items seized from execution of search warrants at 3 Oregon Trail and 8 Hale Drive in Halfmoon, New York. The government requests that you identify with precision **no later than September 6, 2018** which materials you object being made available to all defendants on the ground that your client has an identified privacy interest in it. In addition, the government requests that you place orders for copies of materials that have already been made available to you through DupeCoop and, to the extent you intent to assert that any such materials contain privileged communications, that you provide the government with a log of the specific materials that you assert contain such privileged communications and the basis for such assertions of privilege.

Please do not hesitate to contact us if you have questions. We look forward to your prompt response.

Very truly yours,

RICHARD P. DONOGHUE
United States Attorney

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